

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

MONICA PERRYMAN,)	
)	
Plaintiff,)	
)	2:06-cv-216-mef
V.)	
)	
FIRST UNITED METHODIST)	
CHURCH and DARLENE MAYE,)	
)	
Defendants.)	
)	

NOTICE OF DEPOSITION DUCES TECUM

TO: Norman Hurst, Jr.
462-A Sayre Street
Montgomery, AL 36104

DEPONENT: Monica Perryman

TIME: 9:00 a.m.

DATE: Monday, October 2, 2006

LOCATION: Rushton, Stakely, Johnston & Garrett
184 Commerce Street
Montgomery, Alabama 36104

Please take notice that the Defendants, First United Methodist Church and Darlene Maye, will take the deposition of the deponent named above at the time, date and location indicated above, upon oral examination pursuant to the Federal Rules of Civil Procedure. Said deposition will take place before a Notary Public or other official authorized by law to administer oaths and will continue on the above stated date until complete.

The deponent is requested to bring with her for production at the deposition the following:

1. Copies of any and all written statements, documents, things, memoranda, brochures, applications, policies, reports, handbooks, statements, or other items in Plaintiff's possession relating to her employment made the basis of this lawsuit.
2. Any and all documents and records in her possession relating to her employment with First United Methodist Church at any time.
3. Any and all documents, reports, memoranda, letters or other communication she has either sent or received regarding wage and hour issues with First United Methodist Church.
4. All correspondence, notes and memoranda of any communications by and between her and the Defendants or any other First United Methodist Church employees, or any other persons relating to this case.
5. A listing or other documents identifying all other lawsuits in which she has been involved.

s/Robert A. Huffaker (HUF003)
s/Alan T. Hargrove (HAR236)
s/R. Brett Garrett (GAR085)
**RUSHTON, STAKELY, JOHNSTON
& GARRETT, P.A.**
184 Commerce Street
Post Office Box 270
Montgomery, Alabama 36101-0270
Tel: (334) 206-3215
Fax: (334) 262-6277

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon:

Norman Hurst, Jr.
462-A Sayre Street
Montgomery, AL 36104

by placing same in the United States Mail, postage prepaid and properly addressed on this the 12th day of September, 2006.

s/R. Brett Garrett (GAR085)